

RECEIVED

Jul 30 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

Honorable Diane S. Goodstein, Circuit Court Judge
Circuit Case Number 2024-CP-08-03367

Appellate Case No. 2026-000034

Stephanie Lehman,

Respondent,

v.

Berkeley County School District and Anne-Magill
Payne, individually, and as an agent of Berkeley
County School District,

of whom Berkeley County School
District

is Appellant,

Appellant.

**RESPONDENT'S DESIGNATION OF MATTER
FOR THE RECORD ON APPEAL**

Emmanuel J. Ferguson, Sr.
FERGUSON LAW AND MEDIATION, LLC
SC Bar # 81431
171 Church Street, Suite 160
Charleston, South Carolina 29401
Telephone: (843) 491-4890
emmanuel@fergusonlaborlaw.com
Attorney for Respondent

July 30, 2026
Charleston, South Carolina

Respondent Stephanie Lehman, pursuant to Rule 209, SCACR, designates the following matter for inclusion in the Record on Appeal. Respondent adopts Appellants' Designation of Matter for the Record on Appeal to the extent the materials identified therein are necessary to the issues on appeal. Respondent further designates the following materials, or specifically identifies the following materials within the items already designated by Appellants, to ensure the Record on Appeal contains all matter necessary for review of the issues raised in this appeal.

Counsel for Respondent certifies, pursuant to Rule 209(c), SCACR, that this designation contains no matter that is irrelevant to this appeal.

I. ORDERS

1. Order Denying Appellant Berkeley County School District's Motion to Strike and for More Definite Statement and Defendant Anne-Magill Payne's Motion for More Definite Statement (filed November 6, 2025).
2. Form 4 Order Denying Appellant's Motion to Alter or Amend (filed December 8, 2025).

II. PLEADINGS

1. Amended Summons and Complaint (filed December 3, 2024).
2. Defendant Berkeley County School District's Motion to Strike and for More Definite Statement (filed January 7, 2025).
3. Respondent's Memorandum in Opposition to Defendants' Motion to Strike and Motion for More Definite Statement (filed July 16, 2025).
4. Defendant Berkeley County School District's Motion to Alter or Amend Order (filed November 17, 2025).

III. TRANSCRIPTS

1. Transcript of the hearing on the Motion to Strike and Motions for More Definite Statement held July 17, 2025.

IV. OTHER MATERIAL

1. Notice of Appeal (filed January 6, 2026), excluding the attached copies of the November 6 and December 8 Orders, which are separately designated above.

Respectfully submitted,

FERGUSON LAW AND MEDIATION, LLC

By: s/ Emmanuel J. Ferguson, Sr.

Emmanuel J. Ferguson, Sr.

SC Bar # 81431

171 Church Street, Suite 160

Charleston, South Carolina 29401

Telephone: (843) 491-4890

emmanuel@fergusonlaborlaw.com

Attorney for Respondent

July 30, 2026

Charleston, South Carolina